PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Item 3
Agenda ID 14441

ENERGY DIVISION **RESOLUTION G-3509 (Rev. 1)**
December 17, 2015

R E S O L U T I O N

Resolution G-3509. Pacific Gas and Electric Company (PG&E) seeks approval of the Shareholder-Funded Gas Transmission Safety Account.

PROPOSED OUTCOME:

- PG&E shall revise its proposed Shareholder-Funded Gas Transmission Safety Account to comply with Decision 15-04-024 through a Supplemental Advice Letter (AL) to AL 3596-G.

SAFETY CONSIDERATIONS:

- The Shareholder-Funded Gas Transmission Safety Account is intended to record PG&E gas transmission safety costs associated with certain programs and projects, as well as authorized amounts for those programs and projects. Recorded amounts will be audited by an independent auditor.

ESTIMATED COST:

- There is no cost impact to ratepayers. The Shareholder-Funded Gas Transmission Safety Account tracks the costs of certain PG&E gas transmission pipeline safety improvements that will be funded by PG&E shareholders, pursuant to Decision 15-04-024.

By PG&E AL 3596-G, filed May 20, 2015.

SUMMARY

PG&E's proposed Shareholder-Funded Gas Transmission Safety Account for tracking $850 million in shareholder funded gas transmission pipeline safety improvements does not comply with Decision (D.)15-04-024. That decision levied a fine and penalties on PG&E for violations in connection with the operation of its gas transmission pipelines, including the September 9, 2010 San Bruno pipeline explosion. The utility is ordered to file a Tier 2 Supplemental AL to AL 3596-G to correct the deficiencies.

One penalty required PG&E shareholders to fund $850 million in gas transmission pipeline safety improvements. To track the shareholder spending, PG&E was ordered to establish a Shareholder-Funded Gas Transmission Safety Account (Account) through a Tier 3 AL.

The proposed Account that PG&E filed in AL 3596-G fails to comply with D.15-04-024 in several respects. First, it does not specify that any shareholder spending in excess of the amount that the Commission authorized for a specific program or project cannot count toward the $850 million penalty. Second, it does not provide that any shortfall in actual shareholder funding associated with a specific program or project expense relative to adopted expense amounts would be transferred to the Capital Subaccount. Third, it does not specify that if actual shareholder funding during the 2015-2017 Gas Transmission and Storage (GT&S) proceeding cycle does not fund at least $850 million in adopted costs, the shortfall would carry-over to a GT&S rate case that is subsequent to the utility's 2015 GT&S rate case, Application (A.) 13-12-012. Fourth, the proposed Account does not track and compare spending and adopted expenses and capital expenditures on a specific program/project basis but only on an aggregate basis.

PG&E is ordered to file a Tier 2 Supplemental AL with a revised Account containing the specified modifications no later than 10 days of the effective date of the Resolution.

BACKGROUND

In D.15-04-024, PG&E shareholders were ordered to pay for $850 million in gas transmission pipeline safety improvements as part of the penalties levied in the Commission investigations related to PG&E's operation of and practices associated with its gas transmission pipeline system, including the San Bruno

pipeline explosion.[1] **To track the shareholder spending to be applied toward the $850 million penalty, PG&E was directed to create the Shareholder-Funded Gas Transmission Safety Account.**[2]

The $850 million shareholder funding will be applied towards specific future pipeline safety enhancements authorized in the utility's 2015 GT&S rate case (A. 13-12-012) and any subsequent GT&S proceeding, if necessary. Of the $850 million PG&E shareholder obligation, up to 19 percent ($161.5 million) could be expenses spent on specific safety-related projects or programs with the remainder (at least 81 percent or $688.5 million) being safety-related capital expenditures incurred for specific projects or programs. Capital expenditures funded by shareholders are to be excluded from PG&E's rate base determined in A.13-12-012, and in all PG&E proceedings thereafter.

To track the $850 million of PG&E shareholder spending, the utility was directed to file an AL to establish a deferred liability account titled the "Shareholder-Funded Gas Transmission Safety Account."[3] It is to consist of two sub-accounts; one for expenses for safety-related programs and projects and the other for capital expenditures for safety-related programs and projects. In the sub-accounts, PG&E is to record shareholder expenditures as a debit and the amount that the Commission authorized for the designated safety-related projects and programs as a credit. If PG&E completes any safety-related project or program for less than the Commission authorized amount, the utility is to record only the actual amount expended in the appropriate sub-account. Shareholder spending in excess of the Commission authorized amount for a specific program or project does not qualify for the $850 million penalty and is not to be recorded to the Account by PG&E.

The safety-related programs and projects for which actual and authorized costs will be recorded in the Account will be specified in a forthcoming decision in A. 13-12-012. Under the procedural schedule adopted in A. 13-12-012, an initial

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[1] The San Bruno pipeline explosion related investigations are: I.12-01-007, I.11-02-016 and I.11-11-009.

[2] See D.15-04-024 pp. 94-101 for a discussion of the required elements of the Account described in this section of the Resolution.

[3] D.15-04-024 Ordering Paragraph #6.

decision will be issued specifying the revenue requirement for PG&E's gas transmission and storage system. Then, after receiving comments from parties, the Commission will issue a second decision specifying which adopted costs for safety-related programs and projects should be funded by shareholders.
In AL 3596-G, PG&E filed its proposed Account in response to Ordering Paragraph 6 of D.15-04-024.[4]

NOTICE

Notice of AL 3596-G was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

PG&E AL 3596-G was not protested.

DISCUSSION

The proposed Account filed by PG&E in AL 3596-G does not comply with D.15-04-024 in four respects.

As further discussed below, the proposed Account fails to specify that: 1) any PG&E shareholder spending in excess of the amount authorized by the Commission for each specific designated safety-related program or project the utility undertakes will not be applied toward the $850 million penalty, 2) in the event that actual shareholder funded expenses are less than the adopted expenses, the shortfall should be transferred to the Capital Subaccount, to be spent on capital projects or programs, 3) in the event PG&E shareholders do not spend the full $850 million on designated safety-related program or project adopted in A.13-12-012, the spending shortfall would carry-over to a subsequent GT&S rate case, and 4) the Account needs to track actual expenses and capital

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[4] In AL 3596-G, PG&E designated the proposed Account as Gas Preliminary Statement Part DK for inclusion in its gas tariff.

expenditures as well as adopted expenses and capital expenditures on a program/project basis, not just on an aggregate basis.
PG&E's proposed Account does not specify that any shareholder spending exceeding the Commission authorized amount for each of the designated safety-related programs and projects will not count toward the $850 million penalty.

D.15-04-024 prescribed the method PG&E is to use for recording shareholder spending that qualifies for the $850 million penalty. The utility is to create an account consisting of two sub-accounts. One sub-account would be used for recording shareholder spending on Commission authorized safety-related expense programs and projects and the other sub-account for safety-related capital expenditures. In the sub-accounts, PG&E would record its shareholder spending as a debit and the Commission authorized amounts for the safety-related designated programs and projects as a credit.

Additionally, D.15-04-024 set limits on the aggregate amount of PG&E shareholder spending that PG&E could record to the sub-accounts for expense and capital safety related programs and projects.[5] Another limitation applies according to the amount that the Commission authorized <u>for each</u> designated safety-related program and project, as stated here:

> "In order to ensure that the Expense Sub-Account only includes amounts for these expensed costs that are prudently incurred, <u>for each</u> project or program PG&E shall record no more than the amount authorized for that project or program (including any contingency, if authorized). If PG&E is able to complete <u>any particular project or program</u> for less that the authorized amount, only the amount actually expended shall be recorded in the Expense Sub-Account." (D.15-04-024 at p. 97.) (emphasis added)
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> "… PG&E shall record these capital expenditures as a debit entry in the Capital Sub-Account when PG&E places the plant or facilities in service. <u>As with expensed amounts</u>, PG&E shall record the lesser of the authorized

[5] A maximum of $161.5 million could be debited by PG&E to the expense sub-account and a minimum of $688.5 million could be debited to the capital sub-account. (D.15-04-024 at pp. 94-5.)

> expenditure (plus contingency, if any) or the actual expenditure as a debit entry to the Capital Sub-Account." (D.15-04-024 at p. 98.) (emphasis added)

Furthermore,

> "The $850 million may only be spent on projects or programs that are approved by this Commission in the GT&S, or other proceeding; and amounts that may be recorded in the Shareholder-Funded Account are limited to the lesser of (i) the amount authorized (including any contingency) or (ii) the amount actually expended. Accordingly if this Commission disallows, or limits, any proposed safety-related expenditure by PG&E, in the current GT&S or subsequent proceeding, for any reason other than the amount is to be paid out of the Shareholder-Funded Account, such disallowed amounts may not be booked into the Shareholder-Funded Account, i.e., may be paid for out of the $850 million." (D.15-04-024 at p.98.)

These conditions are intended to make sure that PG&E only records prudently incurred shareholder costs to the Account and that any spending above the Commission authorized amounts for a project and program does not count toward the $850 million penalty.[6] Additionally, the excess shareholder spending cannot be recovered from ratepayers, unless otherwise authorized by the Commission.[7] In the event that PG&E shareholders spend less than the

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[6] PG&E is to also regularly provide a detailed accounting on the shareholder spending in comparison to the Commission authorization on a program and project basis. (D.15-04-024 at pp.99-100.)

[7] PG&E shareholder spending above the Commission authorized amounts for a specific project/program, which cannot be applied toward the $850 million penalty, is presumed imprudent. (D.15-04-024 at pp. 97-8.) Such treatment is also consistent with this passage in D.15-04-024: "The following steps should be taken to ensure that the amounts to be paid by shareholders in the Shareholder-Funded Account are not recovered from ratepayers. For items to be included in the Expense Sub-account, the GT&S proceeding will adopt a forecast of when those expenses will be incurred, and those expenses shall be excluded in calculating the ratepayer-funded revenue requirement for the applicable year. Similarly, the GT&S proceeding will exclude from its forecast of rate base those capital projects or programs to be funded by shareholders and tracked through the Capital Sub-Account,…" (D.15-04-024 at pp. 98-9.)

Commission authorized amount to complete a safety-related program or project, the utility may only record the actual amount of the expenditure. [8]
In AL 3596-G, PG&E filed its proposed Account. It includes the two sub-accounts required by D.15-04-024; one for expenses and the other for capital expenditures. Each sub-account correctly specifies the aggregate amount of shareholder spending PG&E can record for the safety-related expense or capital safety-related programs or projects. Shareholder spending would be recorded as a debit and the Commission authorized amounts as a credit in the sub-accounts, as D.15-04-024 mandated.[9]

However, there are no provisions in the sub-accounts that include the conditions in D.15-04-024 cited above which limit PG&E shareholder spending that may be recorded to a sub-account to the amount that the Commission authorized for a specific program or project. PG&E's proposed expense subaccount would only record the total adopted forecast of safety-related expenses projects/programs to be funded by shareholders, as well as the actual total expenses for designated safety-related projects/programs. Similarly, PG&E's proposed capital subaccount would only record the total adopted forecast of designated safety-related capital projects/programs, as well as actual expenditures. Thus, in both the expense and capital subaccounts, PG&E would only compare total adopted cost amounts to total actual costs, not for each specific program/project, as required by D.15-04-024. If this omission is not corrected, the accounting procedures in the proposed Account would not prevent PG&E from applying any shareholder spending above the Commission authorized amounts for a specific program or project toward the $850 million penalty. And, PG&E might not then need to transfer any of its shareholders underspending on expense

[8] For example, if the Commission authorized $100 million for the vintage pipeline replacement program and PG&E's shareholders spent $120 million on the program, only $100 million can be recorded by the utility to the Account as a debit. The amount spent above the Commission authorization, in this case $20 million, cannot be counted towards the $850 million penalty and could not be recovered from ratepayers by PG&E, unless the utility has Commission authorization to do so. Conversely, if PG&E shareholders spend $80 million on the program, $80 million would be recorded to the Account as a debit and count toward the $850 million penalty, subject to review by an independent auditor.

[9] See Gas Preliminary Statement Part DK, filed in PG&E AL 3596-G.

projects/programs to the capital subaccount nor need to carry over to a future GT&S proceeding the amount of its total shareholder spending that is below $850 million.

PG&E's proposed Subaccounts do not specify that, when underspending on expenses occurs, the underspent amounts should be transferred to the Capital Subaccount.

D.15-04-024 states:

> "In order to ensure that this shareholder-funding remedy is fully implemented, PG&E shall continue recording costs into each sub-account until the total amount designated for funding through each sub-account has been utilized. If PG&E is unable to utilize the full amount designated for funding through the Expense Sub-Account, (because the lesser of its authorized or actual expenses for projects or programs designed (sic) in the GT&S proceeding for funding through this subaccount do not in total reach the amount originally recorded in the account) then the amount not utilized shall be transferred to the Capital Sub-Account, to be spent on capital projects or programs. "(D.15-04-024, pp. 100-101.)

PG&E did include language that indicated that if the adopted expense is less than $161.5 million, the difference between the credit recorded (i.e. the expense amount ultimately adopted in A.13-12-012 for designated program/project expenses) and $161.5 million will be added to the amounts to be funded by shareholders in the Capital Subaccount. But, PG&E did not also include language that indicated that, if expense spending is less than the adopted expense amount, the difference should be transferred to the Capital Subaccount. Further, PG&E did not specify that any such underspending relative to the adopted amount would need to be tracked on a project/program by project/program basis.

PG&E's proposed Account does not specify that meeting the $850 million penalty may involve a GT&S proceeding subsequent to A.13-12-012.

D.15-04-024 provided that:

> "The $850 million should be applied to the cost of future pipeline safety improvements to be approved in the pending Gas Transmission and

> Storage (GT&S) proceeding (A.13-12-012) and any subsequent GT&S proceeding, if necessary." (D.15-04-024 at p. 93.)[10], [11]

PG&E's proposed Account stated that it is intended to record shareholder spending on the designated safety-related programs and projects authorized by the Commission in A.13-12-012. However, it does not specify that meeting its $850 million shareholder obligation could extend to a subsequent PG&E GT&S proceeding, if necessary.

PG&E's proposed Account does not compare actual shareholder expenses and capital expenditures and adopted expenses and capital expenditures for each specific safety-related program/project.

As discussed above**,** D.15-04-024 requires tracking and comparing the actual expenses and capital expenditures for each program and project designated for shareholder funding.

This is clear not only from the specific cites already indicated, but also from the discussion of an information-only filing that is required by D.15-04-024 from PG&E and the level of detail for that information-only filing. D.15-04-024 states:

> "To ensure that amounts debited to the Shareholder-Funded Account are properly recorded, after the end of each calendar year, and no later than May 1 of the following year, PG&E shall submit a detailed accounting to the Commission as an information-only filing, pursuant to Section 6 of General Order 96-B. This information-only filing shall also be served on all parties to these proceedings, all parties to A.13-12-012, and any other persons as directed by the Commission's Energy Division (collectively the "Relevant Parties"). For each project or program recorded in the Shareholder-Funded Account, PG&E shall include at least the following: the precise location of the authorization to include the project or program

[10] See also D.15-04-024 Conclusion of Law #44.

[11] D.15-04-024 Ordering Paragraph #8 addresses a situation if the safety-related programs and projects designated in A.13-12-012 do not exceed $850 million. D.15-04-024 Ordering Paragraph #9 describes the information-only filing PG&E is to file if its shareholder spending does not meet $850 million.

> in the Shareholder-Funded Account: the maximum amount it was authorized to include for that project or program; the actual cost of that project or program up to authorized spending limits (with reference to where detailed supporting accounting can be found); the scope of work actually accomplished; and for capital projects or programs, the date the plant was placed into service. In case of doubt, PG&E should provide more, rather than less, detail about how the monies were expended. PG&E shall also include any additional information as directed by the Energy Division." (D.15-04-024, pp. 99-100.)

PG&E's proposed Expense Subaccount would only record the "total adopted forecast of designated safety-related expense projects/programs to be funded by shareholders" and the "actual expenses incurred for the designated safety-related projects/programs." PG&E would then only compare total adopted amounts to total actual expense. Similar language is proposed for the Capital Subaccount. This language does not adequately provide the level of detail that is required by D.15-04-024.

To comply with D.15-04-024, PG&E shall track and compare adopted and actual expenses/capital expenditures for each safety-related program/project. All amounts recorded to the Account are subject to review by an independent auditor.[12]

PG&E shall file a Supplemental AL to AL 3596-G with modifications to the proposed Account to address the inconsistencies with D.15-04-024 identified herein.

To remedy the inconsistencies with D.15-04-024 identified herein, PG&E shall file a Tier 2 Supplemental AL to AL 3596-G with a revised Account that includes the language shown below.

PG&E shall insert this sentence in the Purpose Section of the proposed Account:

> "Meeting the $850 million PG&E shareholder obligation may extend to a GT&S proceeding subsequent to A.13-12-012."

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[12] D.15-04-024 Ordering Paragraph # 11.

PG&E shall insert this sentence for both sub-accounts described in Accounting Procedure 5:

> "Shareholder expenditures that exceed the amount authorized by the Commission for each safety-related program or project will not be recorded to this subaccount. If shareholder spending is below the Commission authorized amount for a program or project, the actual amount of the shareholder spending will be recorded to the subaccount as a debit. "

PG&E shall insert these sentences in Accounting Procedure 5:

> "If total shareholder spending on expense projects/programs is less than the full amount designated for funding through the Expense Subaccount, then the underspent amount will be transferred to the Capital Subaccount resulting in a corresponding increase in the shareholder's obligation to fund capital projects/programs.
>
> The combined total amount debited to the subaccounts is to be $850 million."

For the Expense Subaccount, PG&E shall replace Accounting Procedure 5.A.1 and 5.A.2 and add Accounting Procedure 5.A.3, as follows:

> "1. A credit entry equal to the adopted forecast for each designated safety-related expense projects/programs to be funded by shareholders;
>
> 2. A debit entry equal to actual expenses incurred for each designated safety-related project/program up to the adopted amount for each project/program recorded in Accounting Procedure 5.A.1. The total debited amount is not to exceed $161.5 million;
>
> 3. A debit entry equal to the amount of shareholder underspending on expense projects/programs transferred to the Capital Subaccount."

For the Capital Subaccount, PG&E shall replace Accounting Procedure 5.B.1 and 5.B.2 and add Accounting Procedure 5.B.3, as follows:

> "1. A credit entry equal to the adopted forecast for each designated safety-related capital project/program to be funded by shareholders;
> 2. A credit entry equal to the adopted forecast of each additional designated safety-related capital projects/programs to be funded by the amount transferred from the Expense Subaccount under Accounting Procedure 5.A.3;
>
> 3. A debit entry equal to actual capital expenditures for each designated safety related capital project/program up to the adopted amount for each project/program recorded in Accounting Procedure 5.B.1 and 5.B.2. The total debited amount is not to be less than $688.5 million."

In addition to these revisions to the proposed Account, PG&E shall maintain sufficiently detailed records of the capital expenditures funded by shareholders so that the exclusion of those projects/programs from PG&E's rate base determined in A.13-12-012 and in all PG&E proceedings thereafter can be verified with complete certainty.[13]

PG&E shall file the Tier 2 Supplemental AL no later than 10 days of the effective date of this Resolution. The Supplemental AL will go into effect upon Energy Division approval. A 20 day protest period shall be instituted for the Supplemental AL.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

[13] D.15-04-024 at p. 95 and Conclusion of Law #40.

On December 7, 2015, PG&E submitted comments on the draft Resolution. The utility recommended that the expense and capital expenditure subaccounts should specify that Commission designated safety-related costs incurred after January 1, 2015 would be recorded.

We decline at this time to decide the date that eligible costs incurred by PG&E can be recorded to the Account. That issue will be deferred to A.13-12-012 as that is the proceeding where we will determine which PG&E projects/programs are safety-related and can be applied toward the $850 million penalty.

FINDINGS

1. D.15-04-024 required PG&E's shareholders to fund $850 million of pipeline safety enhancements authorized by the Commission in A.13-12-012 or subsequent Gas Transmission and Storage (GT&S) proceeding, if necessary.
2. D.15-04-024 ordered PG&E to establish the Shareholder-Funded Gas Transmission Safety Account (Account) with two sub-accounts to track the shareholder spending for expenses and capital expenditures on safety-related projects and programs.
3. To comply with D.15-04-024, PG&E cannot record to the Account any shareholder spending that exceeds the Commission authorized amounts for each designated safety-related program or project.
4. PG&E's proposed Account filed in AL 3596-G did not include the requirement in D.15-04-024 that shareholder spending recorded to the Account could not exceed the amount that the Commission authorized for each designated safety-related program or project.
5. PG&E's proposed Account filed in AL 3596-G did not specify that meeting the $850 million shareholder funding obligation may involve a GT&S proceeding subsequent to A.13-12-012, as D.15-04-024 provides.
6. PG&E's proposed Account did not indicate that, when shareholder-funded expenses for a project or program are less than the adopted amount, the shortfall should be transferred to the Capital Subaccount, as D.15-04-024 requires.
7. PG&E's proposed Account does not track and compare actual and adopted expenses and capital expenditures for each program or project designated by the Commission to be shareholder-funded.

8. D.15-04-024 specifies that capital expenditures to be funded by shareholders shall be excluded from PG&E's rate base to be determined in A.13-12-012, and in all PG&E proceedings thereafter.

THEREFORE IT IS ORDERED THAT:

1. Pacific Gas and Electric Co. (PG&E) shall file a Tier 2 Supplemental Advice Letter (AL) to AL 3596-G no later than 10 days of the effective date of this Resolution with a revised Shareholder-Funded Gas Transmission Safety Account (SFGSTA) containing the sentences shown in Ordering Paragraphs 2, 3, 4, 5, and 6 below. The Supplemental AL will go into effect upon Energy Division approval. The protest period for the Supplemental AL shall be 20 days.

2. PG&E shall insert this sentence in the Purpose Section of the SFGTSA:

   "Meeting the $850 million PG&E shareholder obligation may extend to a PG&E GT&S proceeding subsequent to A.13-12-012."

3. PG&E shall insert this sentence for each subaccount described in Accounting Procedure 5 of the SFGTSA:

   "Shareholder expenditures that exceed the amount authorized by the Commission for each safety-related program or project will not be recorded to this sub-account. If shareholder spending is below the Commission authorized amount for a program or project, the actual amount of the shareholder spending will be recorded to the sub-account as a debit."

4. PG&E shall insert these sentences in Accounting Procedure 5 of the SFGTSA:

   "If total shareholder spending on expense projects/programs is less than the full amount designated for funding through the Expense Subaccount, then the underspent amount will be transferred to the Capital Subaccount resulting in a corresponding increase in the shareholder's obligation to fund capital projects/programs.

   The combined total amount debited to the subaccounts is to be $850 million."

5. For the Expense Subaccount, PG&E shall replace Accounting Procedure 5.A.1 and 5.A.2 and add Accounting Procedure 5.A.3 of the SFGTSA, as follows:

   "1. A credit entry equal to the adopted forecast for each designated safety-related expense projects/programs to be funded by shareholders;

   2. A debit entry equal to actual expenses incurred for each designated safety-related project/program up to the adopted amount for each project/program recorded in Accounting Procedure 5.A.1. The total debited amount is not to exceed $161.5 million;

   3. A debit entry equal to the amount of shareholder underspending on expense projects/programs transferred to the Capital Subaccount."

6. For the Capital Subaccount, PG&E shall replace Accounting Procedure 5.B.1 and 5.B.2 and add Accounting Procedure 5.B.3 of the SFGTSA, as follows:

   "1. A credit entry equal to the adopted forecast for each designated safety-related capital project/program to be funded by shareholders;

   2. A credit entry equal to the adopted forecast of each additional designated safety-related capital projects/programs to be funded by the amount transferred from the Expense Subaccount under Accounting Procedure 5.A.3;

   3. A debit entry equal to actual capital expenditures for each designated safety related capital project/program up to the adopted amount for each project/program recorded in Accounting Procedure 5.B.1 and 5.B.2. The total debited amount is not to be less than $688.5 million."

7. PG&E shall maintain sufficiently detailed records of the capital expenditures funded by shareholders so that the exclusion of those projects/programs from PG&E's rate base determined in A.13-12-012 and in all PG&E proceedings thereafter can be verified with complete certainty.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on December 17, 2015; the following Commissioners voting favorably thereon:

TIMOTHY J. SULLIVAN
Executive Director